

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JANE STREET GROUP, LLC,

*Plaintiff,*

v.

MILLENNIUM MANAGEMENT LLC,  
DOUGLAS SCHADEWALD, and DANIEL  
SPOTTISWOOD,

*Defendants.*

Civil Action No. 24-cv-2783(PAE)

**NOTICE OF MOTION TO: (1)  
DISMISS DEFENDANTS'  
COUNTERCLAIMS PURSUANT TO  
FED. R. CIV. P. 12(b)(1) AND  
12(b)(6); AND (2) STRIKE CERTAIN  
OF DEFENDANTS' AFFIRMATIVE  
DEFENSES PURSUANT TO FED. R.  
CIV. P. 12(f)**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the pleadings, and all other papers herein, Plaintiff Jane Street Group, LLC, by its undersigned attorneys, hereby moves before the Honorable Paul A. Engelmayer, United States District Judge, for: (i) an order, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), dismissing the counterclaims asserted by Defendant Millennium Management, LLC (Dkt. 72) and Defendants Douglas Schadewald and Daniel Spottiswood (Dkt. 74) (collectively, "Defendants") with prejudice, and for such other and further relief as this Court may deem just and proper; and (ii) an order, pursuant to Federal Rule of Civil Procedure 12(f), striking certain of Defendants' affirmative defenses (Dkts. 72, 74) with prejudice, and for such other and further relief as this Court may deem just and proper.

DATED: May 31, 2024

Respectfully submitted,

/s/ Deborah K. Brown

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